

## Complete Personnel Group Privacy Policy

### ***Australian Privacy Principles***

The Australian Privacy Principles established by the Privacy Act 1988 apply to the Complete Personnel Group (CPG)<sup>1</sup>.

We only seek to collect personal information that is necessary for the proper performance of our tasks and functions. So far as is practicable, we may decline to collect unsolicited personal information from or about you and may take such measures as we think appropriate to purge it from our systems.

This policy only applies to our databases and files and does not cover any State, Territory or Commonwealth Government database or file. You are advised to contact the relevant government agency for a copy of their privacy policy.

### ***Collection of Personal Information***

Where practical, we collect most personal information directly from you. For example, if you are a jobseeker/participant we may collect personal information when you fill in an application form at one of our offices to register for employment. We may collect personal information about you when you deal with us by telephone, letter, fax, email, or visit our website.

Generally, the type of personal information we collect about you is the information requested in our Registration Form and your resume. For example, your name and mailing address, telephone number, email address, Centrelink ID number, date of birth, employment, education and qualification history, the type of work you are seeking, if you identify yourself as Indigenous, a person with a disability or a Sole Parent. In some circumstance we may also collect sensitive information such as your health details (including any disabilities), your racial and ethnic origin, barriers to employment, or any criminal record that you may have. Where we collected this information, we will gain your consent.

We collect your personal information in order to provide you employment and related services, including:

- Preparing or placing participants into employment,
- Providing Community Development Program (CDP), Disability Employment Services (DES), ParentsNext, Time to Work Employment Services (TWES) to jobseekers/participants and employers.

There may be occasions when we need to source personal information about you from a third party. For example, we may collect personal information from a referee you have nominated in your resume or previous employers identified in your Registration Form.

As a contracted service provider to the Commonwealth Government of Australia to provide employment and associated services, we may also collect personal information from Commonwealth Government departments and agencies such as Department of Employment and Workplace Relations (DEWR), National Indigenous Australians Agency (NIAA), Department of Social Services (DSS) and Services Australia (Centrelink).

As CPG collects your personal information, or as soon as practicable after, we will take reasonable steps to ensure that you are made aware of:

- CPG's identity and how you can contact us,
- Your rights with regard to accessing your personal information,
- The purpose for which your personal information was collected,
- To whom we usually disclose your personal information,
- Any law that requires us to collect/disclose particular personal/protected information, and
- The main consequences, if any, for you if you do not provide all or part of the information we require.

If you do not provide us with the information we seek, we may be limited in our ability to provide you with our services.

### ***How we Use and Disclose your Personal Information***

We may use and disclose your personal information for the purposes it was collected, or for a related or ancillary purpose such as providing you with one of our employment and related services.

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<sup>1</sup> CPG means Complete Employment Services Pty Ltd and Complete Personnel SA Pty Ltd

We may disclose your personal information to:

- Potential employers,
- Organisations that conduct competency or psychometric tests,
- Referees,
- Suppliers of services to us,
- Our related entities,
- We may disclose your personal information where we are under a legal duty to do so, including circumstances where we are under a lawful duty of care to disclose information (including under class of cases – Public Interest Certificate (PIC), and
- If you are a customer of CDP, DES, ParentsNext, TWES, we are required to share your personal information with a relevant funding Department or Agency and Centrelink for monitoring and wage verification purposes.

We contract out a number of services from time to time. Our contractors may see some of your personal information. Typically, our contractors would include IT Consultants and database designers, Australian Government Services Sub-Contractors, Quality Management System Auditors and service providers.

CPG does not disclose your personal information to third parties for the purposes of allowing them to direct market their products and services.

If you do not consent to the collection and certain uses of personal information, we will not be able to provide you with a particular service.

### ***Personal Information Quality***

If we have accurate personal information about you, it enables us to provide you with the best possible service. We take reasonable steps to ensure that your personal information is accurate, complete, and up to date whenever we collect or use it. If personal information we hold about you is inaccurate, incomplete, or out of date, please contact us immediately and we will correct it.

### ***Personal Information Security***

We protect any personal information that we hold from misuse and loss. We also protect it from unauthorised access, modification, and disclosure.

Only authorised users can access your personal information and access is only for approved purposes. Your personal information may be stored in hardcopy documents, as electronic data, or in CPG software or systems, or in the Department's IT System.

We maintain physical security over our paper and electronic data stores and premises, such as locks and security systems. We also maintain computer and network security, for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems.

In addition, all employees and contractors sign confidentiality agreements as a condition of working for CPG.

We also take reasonable steps to destroy or permanently de-identify personal information if it is no longer required for any purpose.

### ***Access***

Subject to some exceptions that are set out in the Australian Privacy Principles, you can gain access to the personal information that we hold about you.

If you wish to obtain access to your personal information you will be required to complete a Personal Information Access Request form (O39F001). This form can be obtained from your consultant. Your request will be forwarded to our Privacy Co-ordinator who will action your request.

We will not impose a charge in providing access unless your request is excessive. Our Privacy Co-ordinator will discuss these charges with you. Your request will be dealt with in a reasonable time.

There may be some cases where we are unable to provide you access to your personal information, however, CPG staff will explain the reasons why this access was denied.

Form Number: O39P001  
Issued: 26<sup>th</sup> September 2023  
Issuer: Director, Services and Corporate  
Version Number: 2.1  
Review by: 1<sup>st</sup> March 2025  
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***Resolving your concerns, inquiries and complaints***

You can make further inquiries, raise your concerns or complaints about our privacy policy to our Privacy Co-ordinator whose contact details are

Contact: Mr. Craig Lehmann  
Address: PO Box 3154, Melbourne St PO, North Adelaide SA 5006  
Email: [craig@complete-personnel.com.au](mailto:craig@complete-personnel.com.au)  
Phone: 08 8267-0000

You can also make your complaint to the Office of the Federal Privacy Commissioner.

A handwritten signature in blue ink, appearing to read "Craig Lehmann", written over a faint watermark of the COMPLETE personnel logo.

COMPLETE  
personnel

Signature:  
Craig Lehmann (Director, Services and Corporate)

Date 26<sup>th</sup> September 2023